

The claimed invention is a computer-implemented method that comprises: aggregating a plurality of buyers for purchasing at least one telecommunication service as a group; generating a request for purchasing the at least one telecommunication service; presenting the request to a plurality of providers of telecommunication services; receiving replies from the providers; presenting the replies to at least one of the buyers; receiving a selection from at least one buyer in response to the replies; and notifying a provider of the selection. (Claims 1-10). The claimed invention is also a system for purchasing telecommunication services that permits one to carry out the computer-implemented method (claims 11-21); and a computer-readable medium configured so that one may carry out the computer-implemented method (claim 22). As set out in the claims, the claimed method, the claimed system and the claimed computer-readable medium are each specifically adapted for the purchase and sale of telecommunication services.

Shavit et al. discloses a system for interactive on-line communications and interactive on-line processing of business transactions between a plurality of users, including buyers, sellers, financial institutions and freight service providers. See Abstract. Each user communicates with the system from remote terminals adapted to access communication links. Id. Although the system includes a database that contains user information and although the system permits concurrent interactive business transactions between different users (id.), the system is not configured in accordance with the claimed invention.

Shavit et. al. discloses a laundry list of various business trading components. However, no explanation has been provided as to why or how the list relates to the present invention or how the list renders the claimed invention obvious. The Applicants submit that the wholesale listing of various components to a business transaction is insufficient to render obvious the claimed invention, which carefully describes the various elements related to telecommunication

services and is further limited by the sequence in which the elements are presented during a transaction for telecommunication services. For example, the claims specify (1) that a plurality of buyers are aggregated for purchase of at least one telecommunication service; (2) that a request for purchasing the at least one telecommunication service is generated; (3) that the request is presented to a plurality of providers of telecommunication services; (4) that replies from the providers are received; (5) that the replies are presented to at least one of the buyers; (6) that a selection from at least one buyer in response to the replies is received; and (7) that a provider of the selection is notified. This is consistent with the buyer driven model offered by the invention. Thus, the identity of the buyer(s) is (are) reserved until the buyer(s) select(s) a specific seller of telecommunication services. This sequence of events is not taught by Shavit et. al. which considers information about the buyer integral to the original transaction to arrange for shipping, third-party financing, delivery notification, etc. See, for example, col. 11 at lines 14-20.

Like Shavit et. al., Shkedy does not disclose or suggest the claimed invention. Shkedy discloses a system and method for creating a binding contract. See Abstract. The system and method includes (1) aggregating individual buyers purchase requirements into a single collective purchase requirement; and (2) locating sellers willing to bid on the collective purchase requirement; Id. A central controller fields **binding** offers from buyers, aggregates the offers and communicates the aggregated offer to potential sellers. Id. This methodology does not disclose or suggest the claimed methodology, which includes presenting seller “replies” to at least one buyer so that the buyer may select a seller based on the replies.

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The Applicants submit that the present invention is not rendered obvious by either reference alone or in combination. The Applicants therefore request the allowance of claims 1-22.

In view of the above remarks, the Applicants respectfully submit that the claimed invention is in condition for allowance. Early and favorable notice to that effect is respectfully solicited. If the Examiner has any questions regarding this submission or if an interview at this time would further the progress of this application to a favorable conclusion, please contact the undersigned at the telephone number provided.

Respectfully submitted,

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